

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA,

v.

NISSAM ALFASI

Defendant

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CRIMINAL NO. PX-19-77

CONSENT MOTION TO RELEASE PASSPORT

Defendant Nissim Alfasi (“Mr. Alfasi”), by and through his undersigned counsel, and with the consent of the United States, hereby moves the Court for an order directing the Clerk to return defendant’s passport, and states the following:

1. Mr. Alfasi is a citizen of Israel who was extradited to the United States in the captioned case. On August 4, 2023, in conjunction with the defendant’s initial appearance, his passport was surrendered to the Clerk as a special condition of defendant’s release. ECF 306.
2. On November 30, 2023, the Court sentenced Mr. Alfasi to 18 months imprisonment. ECF 396. On January 15, 2024, Mr. Alfasi self-surrendered at FCI Danbury in Connecticut. As a result, there is no need for the Court to retain his passport as a means of guaranteeing his appearance before the Court or his surrender to serve his sentence.
3. Mr. Alfasi respectfully requests that the Court enter an order directing the Clerk to release his passport to undersigned counsel.
4. Department of Justice Trial Attorney David Hamstra consents to the requested relief.

WHEREFORE, Mr. Alfasi respectfully requests that the Court entered the attached proposed order directing the Clerk to return his passport to undersigned counsel.

Respectfully submitted,

/s/ Stuart A. Berman

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Counsel for Defendant Nissim Alfasi

Dated: January 16, 2024